

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
)	Criminal No. 2:23-cr-20191
)	
)	
EMMITT MARTIN, et al.,)	
)	
Defendants.)	

MOTION FOR PROTECTIVE ORDER

The United States (the “Government”) intends to provide a Notice of Disclosure of Oral Communications that sets forth certain ex parte communications by the Court regarding the above styled case. The United States requests that this Court enter a protective order to protect the Government, the Defendants, and their counsel and agents from claims of improper disclosure of sensitive information contained therein. Because the Notice contains information regarding an ongoing criminal investigation, the release of this Notice without any restriction could compromise said investigation. The government has consulted with opposing counsel and the Motion is unopposed. The government therefore requests that this Court allow defense access to this Notice subject to the following protective measures:

(a) defendants and defense counsel be prohibited from disclosing the Notice and the subject matter contained therein to anyone other than authorized persons defined as defendants, defense counsel, their respective employees and any person retained by counsel to assist in the preparation, trial, or appeal of this criminal action (or any collateral civil matter arising directly from this

criminal action), including their consultants, agents, experts, and investigators. With respect to such persons, the Notice shall be disclosed to the person only to the extent necessary to perform the work for which the person was retained; and the person shall not retain the Notice after his or her work related to this criminal action has concluded;

(b) should defendant or defense counsel need to file any motion, pleading, or other notice referencing the Notice defendant and defense counsel shall be required to file any such document under seal.

Respectfully submitted,

JOSEPH C. MURPHY, JR.
Interim United States Attorney

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cc: Clerk of the Court (W.D. Tenn.)

CERTIFICATE OF CONSULTATION

I, David Pritchard, Assistant United States Attorney for the Western District of Tennessee, hereby certify that on June 13, 2025, I conferred with counsel for Defendants, who confirmed that they do not object to the relief sought in this motion.

/s/ David Pritchard
David Pritchard
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, David Pritchard, Assistant United States Attorney for the Western District of Tennessee, hereby certify that the foregoing pleading was filed under seal by electronic means via the Court's electronic filing system, and a copy of the pleading was emailed to counsel for Defendants.

This date: June 13, 2025.

/s/ David Pritchard
David Pritchard
Assistant United States Attorney